

# **EXHIBIT A**



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August 22, 2024

**Via ECF**

Hon. Jennifer H. Rearden  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Sydney Hyman v. Andrew Fabbri and Jessica Cohen  
Case No. 19-civ. 10506 (JHR)(SLC)

Dear Judge Rearden:

As Your Honor may recall, we represent the Plaintiff Sydney Hyman (“Plaintiff” or “Hyman”), in the above-referenced matter. We submit this joint letter motion along with Murad Michael Khan, Khan Johnson, LLP, counsel for Defendant Andrew Fabbri (“Defendant” or “Fabbri”) in this matter.

The parties fully executed a Settlement Agreement in this matter. Pursuant to the specific terms of the Settlement Agreement, Defendant will be making payments to Plaintiff pursuant to an agreed upon schedule over the next six months, concluding with the last payment due on or before January 22, 2025. The parties jointly request that Your Honor please consent to keep this case open, but stayed, during this six-month period to allow for the Defendant to fully perform his payment obligation under the Settlement

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Agreement. In the unlikely event that any issues develop during such period, the parties believe it is beneficial for all to be able to seek any relief for any breaches of the Settlement Agreement directly with Your Honor. In the event that Defendant fails to make any of the required payments that are due to Plaintiff during this period, a Consent Judgment has been signed by Defendant and included in the Settlement Agreement, which would have to be submitted to Your Honor in the event of an uncured breach, and then So-Ordered. In order to avoid having to file a new action in such a situation, the parties would like to be able to seek any such necessary relief directly from the Court in this matter, however unlikely such a situation may be.

Thank you in advance for your kind consideration and attention to this matter.

Sincerely yours,

HARRINGTON, OCKO & MONK LLP

KHAN JOHNSON, LLP

s/ Kevin J. Harrington

s/ Murad Michael Khan

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By: Kevin J. Harrington, Esq.

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By: Murad Michael Khan, Esq.

cc: Hon. Sarah L. Cave  
United States Magistrate Judge